

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KAJEET, INC.,

Plaintiff,

v.

MCAFEE CORP.,

Defendant.

C.A. No. 21-cv-5-MN

JURY TRIAL DEMANDED

DEFENDANT MCAFEE CORP.'S MOTION TO DISMISS

Defendant McAfee Corp (“McAfee”) hereby moves this Court to dismiss Plaintiff Kajeet, Inc.’s (“Kajeet”) claims for direct, indirect, and willful infringement of U.S. Patent 8,667,559, along with Kajeet’s past damages claim, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim upon which relief can be granted.

The basis of this motion is more fully set forth in Defendants’ Opening Brief in Support of Motion to Dismiss, filed herewith. A proposed form of Order is attached.

By: /s/ Susan E. Morrison

Susan E. Morrison (#4690)
FISH & RICHARDSON P.C.
222 Delaware Avenue, 17th Floor
P.O. Box 1114
Wilmington, DE 19899
Tel: (302) 652-5070
morrison@fr.com

Aamir Kazi
Fish & Richardson P.C.
1180 Peachtree Street NE, 21st Floor
Atlanta, GA 30309
Tele: 404-724-2811
kazi@fr.com

**ATTORNEYS FOR DEFENDANT
MCAFEE CORP.**

Dated: March 29, 2021